

1.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

COUNTS TWO THROUGH FIFTEEN  
( [REDACTED] )

2. [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

COUNT		
TWO	[REDACTED]	[REDACTED]
THREE	[REDACTED]	[REDACTED]
FOUR	[REDACTED]	[REDACTED]
FIVE	[REDACTED]	[REDACTED]
SIX	[REDACTED]	[REDACTED]
SEVEN	[REDACTED]	[REDACTED]
EIGHT	[REDACTED]	[REDACTED]
NINE	[REDACTED]	[REDACTED]
TEN	[REDACTED]	[REDACTED]
ELEVEN	[REDACTED]	[REDACTED]
TWELVE	[REDACTED]	[REDACTED]
THIRTEEN	[REDACTED]	[REDACTED]
FOURTEEN	[REDACTED]	[REDACTED]
FIFTEEN	[REDACTED]	[REDACTED]

[REDACTED]

[REDACTED]

COUNT SIXTEEN  
(Conspiracy to Obstruct Justice)

3. On or about and between September 21, 2009 and March 22, 2010, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant RICARDO VILLARAGA FRANCO, together with others, did knowingly,

intentionally and corruptly conspire to obstruct, influence and impede an official proceeding, to wit: a proceeding before a Federal grand jury in the Eastern District of New York, in violation of Title 18, United States Code, Section 1512(c)(2).

(Title 18, United States Code, Sections 1512(k) and 3551 et seq.)

COUNT SEVENTEEN  
(Conspiracy to Obstruct Justice)

4. On or about and between January 1, 2010 and March 22, 2010, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants

[REDACTED]

[REDACTED] and RICARDO VILLARAGA FRANCO, together with others, did knowingly, intentionally and corruptly conspire to obstruct, influence and impede an official proceeding, to wit: a proceeding before a Federal grand jury in the Southern District of New York, in violation of Title 18, United States Code, Section 1512(c)(2).

(Title 18, United States Code, Sections 1512(k) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNTS ONE THROUGH FIFTEEN

5. The United States hereby gives notice to the defendants charged in Counts One through Fifteen that, upon conviction of any such offense, the government will seek forfeiture in accordance with Title 18, United States Code,

Section 982(a)(1), of all property involved in each offense of conviction in violation of [REDACTED] and conspiracy to commit such offense, and all property traceable to such property as a result of the defendants' conviction of the offense, including but not limited to, a sum of money representing the amount of funds involved in the offense.

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982, to seek forfeiture of any other property of such defendant(s) up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 982)

FORFEITURE ALLEGATION AS TO COUNTS SIXTEEN AND SEVENTEEN

7. The United States hereby gives notice to the defendants charged in Counts Sixteen and Seventeen that, upon conviction of any such offense, the government will seek forfeiture, in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), of any property constituting or derived from proceeds obtained directly or indirectly as a result of the offense, including but not limited to a sum of money representing the amount of proceeds obtained as a result of the offense.

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28,

United States Code, Section 2461(c), to seek forfeiture of any other property of such defendant(s) up to the value of the forfeitable property described in this forfeiture allegation.

(Title 28, United States Code, Section 2461(c); Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p))

A TRUE BILL

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FOREPERSON

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BENTON J. CAMPBELL  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK